

EXHIBIT A-1

8/18/25, 2:32 PM

Gmail - Case 4:24-cv-00698: CV-7(i) Conferral + Requested Stipulation—No Use of June 9 / July 18 Sets Pending Dkt. 94/106



Dilip Jana <janadilip@gmail.com>

Case 4:24-cv-00698: CV-7(i) Conferral + Requested Stipulation—No Use of June 9 / July 18 Sets Pending Dkt. 94/106

1 message

Dilip Jana <janadilip@gmail.com>

Mon, Aug 18, 2025 at 7:40 AM

To: peter.wahby@gtlaw.com, morgan.jones@gtlaw.com, Holmes.Hampton@gtlaw.com

Cc: Dilip Jana <janadilip@gmail.com>

Dear Counsel,

Pursuant to **CV-7(i)**, I seek your position on this **narrow stipulation**:

Pending the Court's ruling on Dkt. 94/Dkt 106, Walmart will not cite, paraphrase, attach, or otherwise use any material from its **June 9, 2025** or **July 18, 2025** transmissions in any **Rule 72 objections**, **Answer to Complaint(Dkt 13)**, or **contemporaneous filing**.

Please advise by 2:00 p.m. CDT today whether you agree. If not, I will file an appropriate motion. I am available for a conferral any time today if you want to talk.

Regards,
Dilip Jana

Pro Se Plaintiff

800 Fairlawn St, Allen, TX 75002

Ph: 318-243-9743 | janadilip@gmail.com

On Mon, Aug 18, 2025 at 7:31 AM Dilip Jana <janadilip@gmail.com> wrote:

Dear Counsel,

Please confirm by **2:00 p.m. CDT today** that a litigation hold is in place covering Walmart's June 9, 2025 and July 18, 2025 transmissions, including:

- **Greenberg Traurig–hosted repositories/links** provided to Plaintiff;
- **Any e-discovery vendor platforms** used; and
- **All Walmart corporate cloud repositories** where the transmitted materials originated or were staged (e.g., Microsoft 365 SharePoint/OneDrive/Teams; Exchange/Outlook mail servers; Box/ShareFile; Google Workspace/Drive; or equivalent).

The hold should preserve, without alteration or deletion:

- **The native files comprising each production set, preserved as follows:**
 - **June 9, 2025 set:** as it existed on June 9 (initial transmission), June 19 (expiration of access link), July 21, July 24, August 4, and today;
 - **July 18, 2025 set:** as it existed on July 18 (initial transmission), July 21, July 24, July 28, August 4, and today.
- All versions and version histories for each file;
- Associated audit/activity logs (create/upload/modify/download/share events, link creation, recipients, user IDs, timestamps, client IPs, and admin actions); and
- Related email/link messages and server/message-trace logs.

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Please also confirm suspension of any auto-deletion or retention policies that could impact those sources. This is strictly an administrative **preservation request during the stay (Dkt. 99)** and seeks no production. All rights are reserved.

Kind regards,

Dilip Jana
Pro se Plaintiff

800 Fairlawn st, Allen, TX, 75002

----- Forwarded message -----

From: <txedCM@txed.uscourts.gov>

Date: Fri, Aug 15, 2025 at 11:05 AM

Subject: Activity in Case 4:24-cv-00698-SDJ-BD Jana v. Walmart, Inc. Order

To: <txedcmcc@txed.uscourts.gov>

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U.S. District Court

Eastern District of TEXAS [LIVE]

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The following transaction was entered on 8/15/2025 at 11:04 AM CDT and filed on 8/15/2025

Case Name: Jana v. Walmart, Inc.

Case Number: 4:24-cv-00698-SDJ-BD

Filer:

Document Number: 107

Docket Text:

ORDER AND REPORT AND RECOMMENDATION OF UNITED STATES MAGISTRATE JUDGE. It is **ORDERED** that Walmart's motion to strike, Dkt. [32], is **DENIED**, and that Jana's motion for leave, Dkt. [33], is **GRANTED**. It is **RECOMMENDED** that Walmart's motion to dismiss, Dkt. [22], be **DENIED**. Objections due within 14 days of receipt (Motion(s)[32], [33] terminated). Signed by Magistrate Judge Bill Davis on 8/15/2025. (jmb)

4:24-cv-00698-SDJ-BD Notice has been electronically mailed to:

Peter Samir Wahby wahbyp@gtlaw.com, holmes.hampton@gtlaw.com, mcphersonm@gtlaw.com, peter-wahby-7748@ecf.pacerpro.com

Morgan Jones morgan.jones@gtlaw.com, maria.mojica@gtlaw.com

Holmes Hugh Hampton holmes.hampton@gtlaw.com

Dilip Jana janadilip@gmail.com

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[STAMP dcecfStamp_ID=1041545818 [Date=8/15/2025] [FileNumber=15403016-0] [b61784199da89c5de890e172309e78bea0cbe45d1bb973aefb2800b49b3378af0b4b18fb0da7677b57adc6ecaed9ca44514be2d59402bedb5dab153e586bc829]]

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Thanks
Dilip

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Thanks
Dilip